

Department of Energy

Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

3 0 APR 2003

Mr. Steve Zappe, WIPP Project Leader Hazardous Waste Permits Program Hazardous and Radioactive Materials Bureau New Mexico Environment Department 2905 E. Rodeo Park Drive, Bldg. 1 Santa Fe, NM 87505





Subject: Transmittal of Approved Waste Stream Profile Form for Rocky Flats

Environmental Technology Site Update to Waste Stream Profile Form Number

RF002.01 - Non-Mixed Metal Debris

Dear Mr. Zappe:

The Department of Energy, Carlsbad Field Office (CBFO) has approved the update to Rocky Flats Environmental Technology Site (RFETS), Waste Stream Profile Form RF002.01. Enclosed is a copy of the approved form as required by Section B-4(b)(1) of the WIPP Hazardous Waste Facility Permit No. NM4890139088-TSDF.

If you have any questions on this matter, please contact me at (505) 234-7357 or (505) 706-0066.

Sincerely,

Kerry W. Watson

CBFO Assistant Manager

Office of National TRU Program

Enclosure

cc: w/o enclosure

J. Kieling, NMED

C. Walker, TechLaw

J. Bennett, WTS

P. Roush, WTS

L. Greene, WRES

S. Calvert. CTAC

CBFO M&RC

030451

Update for WIPP Operating Record (Change Notice #3) TRU Metal Debris Waste (RF002.01)

Please add the following information to the WIPP Operating Record for: WSPF # RF002.01, Revision 3, as amended by WIPP operating record updates dated 11/6/02 and 12/10/02. This waste stream is TRU Metal Debris Waste and was approved by DOE/CBFO on March 9, 2000. Please update related files as appropriate.

The Waste Stream Profile Form (WSPF) is being revised. The WSPF components are bolded. The updates are:

1. WIPP ID [WTWBIR ID (HQ ID)]: Add the following WIPP ID numbers:

RF-TR0489 (RF-W109), RF-TT0489 (RF-W109)

- 2. Number of Drums: Add an additional 103 drums
- 3. Applicable TRUCON Content Codes: Add the following TRUCON Content Codes (new codes for beryllium in quantities greater than 1 percent by weight):

RF 131A, RF 131B, RF 131D, RF 131E, RF 131F, RF 131H, RF 131I, RF 131K, ŘF 131N, RF 131T

The Acceptable Knowledge (AK) Summary attachment to the WSPF is being revised. The AK Summary components are bolded. The updates are:

- 1. Waste Stream: Add RF-197W, RF-489, and RF-854
- 2. Waste Stream Volume (Current): Add an additional 82 drums
- 3. Waste Stream Volume (Projected): Add an additional 21 drums
- 4. Applicable TRUCON Content Codes: Add the following TRUCON Content Codes (new codes for beryllium in quantities greater than 1 percent by weight):

RF 131A, RF 131B, RF 131D, RF 131E, RF 131F, RF 131H, RF 131I, RF 131K, RF 131N, RF 131T

5. WIPP Identification Numbers: Add RF-TR0489, RF-TT0489

Note: IDCs 197W and 854 are not in the TWBIR.

- 6. Waste Stream Description:
 - Add the following to the first sentence:
 - ... tantalum targets and subtargets <10% (197W), classified Be scrap metal shapes (IDC 489), and beryllium metal (IDC 854).
 - Edit IDC 197 and add IDCs 489 and 854 in the table on page 35 as follows:

IDC	IDC Description	Waste Matrix Code	Waste Material Parameters	Weight % (Average)
197 <u>W</u>	Ta Target and Subtarget, <10%-To-Be-Leached	S5111, Metal Debris w/o Pb or Cd	Other Metals/Alloys	100%
489	Classified Be Scrap Metal Shapes	S5111, Metal Debris w/o Pb or Cd	Other Metals/Alloys	100%
854	Beryllium Metal	S5111, Metal Debris w/o Pb or Cd	Other Metals/Alloys	100%

• Edit the following IDC descriptions:

IDC 197W, Ta Target and Subtarget ≤10%: Tantalum targets and subtargets are classified tantalum substrates shapes historically used for coating processes. The materials are size-reduced prior to being repackaged. A "W" is appended to this IDC for those targets and subtargets that have been designated as waste (i.e., contain less than 10% plutonium.).

IDC 484, Classified Non-Nuclear Material Scrap Metal: This IDC is assigned to classified non-nuclear material scrap metal shapes composed primarily of stainless steel and aluminum. These items were generated in Buildings 777 and 779 during disassembly operations of site-return units. Prior to the creation of IDC 489 in 1987, IDC 484 was also used for beryllium shapes. The IDC 484 containers will be evaluated to identify those containing with beryllium shapes have been reassessed to IDC 489 and will not be shipped to WIPP at this time.

Add the following IDC descriptions:

IDC 489, Classified Be Scrap Metal Shapes: This waste consists of classified scrap beryllium scrap metal shapes historically generated during the disassembly of site-return units.

IDC 854, Beryllium Metal: This waste consists of various sizes of beryllium metal pieces (unclassified) generated during decommissioning of the site.

7. Generation Processes: Add the following processes to the table:

Building	Process	Title
		Building 371
371	27	Dry Residue Repack
371	36	Metal Inspection, Brushing and Packaging

8. RCRA Characterization: Add or delete the following information in the table:

IDC	BWR Subpopulation	WSRIC Waste Stream	RCRA CCCs	Non-RCRA CCCs	EPA Hazardous Waste Numbers
		Ta Tar	gets and Sub-tar	gets .	
197	·	707 - 41 - 1	00	00	None
		Ta Targets	and Sub-targets	r <10%	
197W		371 - 27 - 1A	00	07	None
		Classified	Be Scrap Metal	Shapes	
0489		371 - 15 - 208	00	07	None
0489		371 - 36 - 21	00	07	None
0489		440STOR - 11 - 58	00	07	None
0489		776_777 - 6 - 84	00	07	None
0489	24T		£ 00	07	None
		В	eryllium Metal		
0854		707 - 36 - 64	00	07	None
0854		776_777 - 6 - 108	.00	0732	None
0854		779 - 40 - 95	.00	07	None

9. Radionuclides: Edit IDC 197 and add IDCs 489 and 854 in the first table as follows:

IDC	Radionuclides	Rationale
197 <u>W</u>	WG Pu, EU	IDC generated by Building 777 coatings, which coated substrates with plutonium and enriched uranium (and non-radioactive metals).
489	WG Pu, DU, EU	IDC generated primarily during disassembly of site-return units Building 777, but also from R&D and D&D operations.
854	WG Pu, Am-241, EU, NP-237	IDC generated during deactivation and decommissioning of Buildings 707, 776/777, and 779.

Reason/Justification for Change:

IDCs 197W, 489, and 854 are being added to WSPF RF002.01 because classified tantalum waste and classified and unclassified beryllium metal waste will be disposed of at WIPP. These IDCs can be included in this waste stream because they were generated by the same processes as the other metal wastes, and are similar in material, physical form, and hazardous constituents (none in this case) to the other metal wastes included in this waste stream. As the following demonstrates, IDCs 197W, 489, and 854 are considered part of this TRU Metal Debris waste stream:

- The specific generation processes that are listed in the AK Summary attached to WSPF RF002.01 (and previous WIPP Operating Record updates for RF002.01) include the historical production processes (e.g., 777-2, Disassembly) and the more recent processes (e.g., 707-36, Decommissioning) that also generated IDCs 197W, 489, and 854. The generation processes being added to this waste stream (refer to Item 7 above) are only for repackaging operations.
- IDCs 197W, 489, and 854 are comprised of the same material and physical form as the other IDCs in this waste stream (i.e., classified metal shapes are designated as Waste Matrix Code Group "Uncategorized Metal" and Waste Matrix Code S5111).
- As with the other IDCs in this waste stream, classified metal shapes were not mixed with a RCRA hazardous waste and do not exhibit any RCRA hazardous waste characteristics.

Update for WIPP Operating Record (WSPF RF002.01) certification:

I hereby certify that I have reviewed the information in this Update for WIPP Operating Record, and it is complete and accurate to the best of my knowledge. I understand that this information will be made available to regulatory agencies and that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

rojeo/Manager

G. A. O'Leary, Manager TRU Programs

Printed Name and Title



Department of Energy

Carlsbad Area Office
P. O. Box 3090
Carlsbad, New Mexico 88221

March 9, 2000

John Kieling, Manager
Hazardous Waste Permits Program
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, New Mexico 87502-6110

Subject:

TRANSMITTAL OF APPROVED WASTE STREAM PROFILE FORM FOR

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE; WASTE

STREAM RF002.01

Dear Mr. Kieling:

The Department of Energy, Carlsbad Area Office has approved the Rocky Flats Environmental Technology Site Waste Stream Profile Form for Waste Stream RF002.01, Rev. 3. Enclosed is a copy of the approved form as required by Section B-4(b)(1) of the WIPP's Hazardous Waste Permit No. NM4890139088--TSDF.

Please contact Mr. Jim Klaus at (505) 234-7350 should you have any questions regarding this approval.

Sincerely,

hes (thay) Dr. Inés R. Triay

Manager

cc:

S. Zappe, NMED

E. Rose, CAO

B. Stroud, CAO

C. Zvonar, CAO

C. Walker, TechLaw

G. Barnes, WID

J. Epstein, WID

K. Mikus, WID (Operating Record)

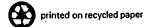
L. Steven, WID

M. Whatley, WID

MAIL ROOM COPY

0001050

CAO:NTWP:RAS 00-0548 UFC 5822



5822.50



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Waste Stream Profile Number: RF002.01	
Generator site name: RFETS	Technical contact: Eric D'Amico
Generator site EPA ID: CO7890010526	Phone number: (303) 966-5362
Date site certified by CAO: March 9, 2000	
Title, version number, and date of documents used for WAC certifica TRU Waste Characterization Program Quality Assurance Project Platansuranic (TRU) Waste Management Manual, Revision 3, 1-MAN Acceptance Criteria, DOE/WIPP-069, Revision 7, DOE/WIPP-069, National Control of the	an, Revision 4, 95-QAPIP-0050, December 1999. -008-WM-001, December 1999. WIPP Waste
Did your facility generate this waste? ☑Yes ☐ No If no, provide the	ne name and EPA ID of the original generator:
Waste Stream Information (1)	
WIPP ID [WTWBIR ID (HQ ID)]: RF-TT0320 (RF-W111), RF-TT047	9 (RF-W109), RF-TT0480 (RF-W109)
RF-TT0481 (RF-W109), RF-TR0320 (RF-W111), RF-TR0479 (RF-W	
	Group: Uncategorized Metal
Waste Stream Name: Metal/TRU and Heavy Metal (non-SS)/TRU	
Description from the WTWBIR: <u>Includes items such as glovebox consists of tantalum, tungsten, and platinum scrap such as crucibles</u>	kes, machinery, and empty containers. IDC 320
Defense TRU Waste: ☑ Yes ☐ No Check one: ☑ CH ☐ RH	
Number of SWBs 194 Number of Drums 922	Number of Canisters N/A
Data package numbers supporting this waste stream characterization	on: See Table 7.
List applicable EPA Hazardous Waste Codes(2): None	
Applicable TRUCON Content Codes: RF 117A, RF 117B, RF 117C	, RF 117D, RF 117E, RF 117F, RF 117N
Acceptable Knowledge Information(1)	
[For the following, enter supporting the documentation used (i.e., rei	ferences and dates)]
Required Program Information	
Map of site: Reference List, No. 3	
Facility mission description: Reference List, No. 3	
Description of operations that generate waste: Reference L	ist, Nos. 1, 2, 3, 6
Waste identification/categorization schemes: Reference List	st, Nos. 11, 12
Types and quantities of waste generated: Reference List, No.	os. 1, 2, 3
 Correlation of waste streams generated from the same buildin Nos. 1, 2, 6 	g and process, as appropriate: Reference List,
Waste certification procedures: Reference List, No. 5	
Required Waste Stream Information	·
Area(s) and building(s) from which the waste stream was gene	
	rence List, Nos. 4, 6
 Waste generating process description for each building: Re 	ference List, Nos. 1, 2, 6
Process flow diagrams: Reference List, Nos. 1, 2	
Material inputs or other information identifying chemical/radior	nuclide content and physical waste form:
Reference List, Nos. 1, 2, 3, 6	
Which Defense Activity generated the waste: (Check one)	Reference List, No. 3
☑ Weapons activities including defense inertial confinement	
 Verification and control technology 	Defense research and development
 Defense nuclear waste and material by products manage 	ement Defense nuclear materials production
Defense nuclear waste and materials security and safegu	uards and security investigations



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Sup	plemental Documentation
•	Process design documents: N/A
•	Standard operating procedures: N/A
•	Safety Analysis Reports: N/A
••	Waste packaging logs: N/A
•	Test plans/research project reports: N/A
•	Site data bases: N/A
•	Information from site personnel: N/A
•	Standard industry documents: N/A
•	Previous analytical data: N/A
•	Material safety data sheets: N/A
•	Sampling and analysis data from comparable/surrogate Waste: N/A
•	Laboratory notebooks: N/A
Sam	pling and Analysis Information(1)
[For	the following, when applicable, enter procedure title(s), number(s) and date(s)]
Ø	Radiography: Reference List, Nos. 8, 9
Ø	Visual Examination: Reference List, No. 7
\square	Headspace Gas Analysis
	VOCs: Reference List, No. 10
	Flammable: Reference List, No. 10
	Other gases (specify): N/A
	Homogeneous Solids/Soils/Gravel Sample Analysis (Tables 1, 3, 4, and 5 are not applicable and not included)
	Total metals N/A
	PCBs: N/A
	VOCs: N/A
	Nonhalogenated VOCs: N/A
	Semi-VOCs: N/A
	Other (specify): N/A
Was	te Stream Profile Form certification:
l her	reby certify that I have reviewed the information in this Waste Stream Profile Form, and it is complete and
	rate to the best of my knowledge. I understand that this information will be made available to regulatory
	icies and that there are significant penalties for submitting false information, including the possibility of fines and
нпрп	isonment for knowing violations.
,	MIC 1/1/2 3/0/2
_4	G. A. O'Leary
Sign	ature of Šite Project Manager Printed Name and Title Date

NOTE (1) Use back of sheet or continuation sheets, if required.

(2) If radiography, visual examination, headspace gas analysis, and/or homogeneous solids/soils/gravel sample analysis were used to determine EPA Hazardous Waste Codes, attach signed summary reports documenting this determination.

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REFERENCE LIST

- 1 Backlog Waste Reassessment Baseline Book, Waste Form 24, Metal, May 1999, and Waste Form 25, Heavy Metal, January 1999.
- 2. Waste Stream and Residue Identification and Characterization (WSRIC), Revision 6, and archived versions.
- RFETS TRU Waste Acceptable Knowledge Supplemental Information, RF/RMRS-97-018, Revision 6, November 1999.
- 4. Waste and Environmental Management System (WEMS) database.
- Transuranic Waste Certification, 1-PRO-X05-WC-4018, Revision 0, May 1997.
- 6. Acceptable Knowledge TRU/TRM Waste Stream Summaries, RMRS-WIPP-98-100, Revision 6, December 1999.
- 7. Visual Examination for the TRU Waste Characterization Program, 4-H80-776-ASRF-007, Revision 2, December
- 8. Real-Time Radiography Testing of Transuranic and Low-Level Waste, 4-W30-NDT-00664, Revision 2, November 1999.
- Real-Time Radiography Testing of Transuranic and Low-Level Waste in Building 569, 4-I19-NDT-00569, Revision 3, November 1999.
- 10. GC/MS Determination of Volatile Organics Waste Characterization, L-4111-Q, November 1999.
- 11. Waste Characterization, Generation, and Packaging, 1-PRO-079-WGI-001, Revision 0, November 1997.
- 12. Waste Characterization Program Manual, 1-MAN-036-EWQA-Section 1.6.1, Revision 1, December 1999.

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Form A Reconciliation with Data Quality Objectives

I certify by signature (below) that sufficient data have been collected to determine the following Program-required waste parameters:

WSPF # RF002.01

	Check	
ltem	Box ^a	Reconciliation Parameter
1	V	Waste Matrix Code as reported in WEMS.
2	✓ .	Waste Material Parameter Weights for individual containers as reported in WEMS.
` 3	1	The waste matrix code identified is consistent with the type of sampling and analysis used to characterize the waste.
4	√ .	Container mass and activities of each radionuclide of concern as reported in WEMS.
5	*	Each waste container of waste contains TRU radioactive waste.
6	*	Mean concentrations, UCL ₉₀ for the mean concentrations, standard deviations, and the number of samples collected for each VOC in the headspace gas of waste containers in the waste stream/waste stream lot.
7	N/A	Mean concentrations, UCL ₉₀ for the mean concentrations, standard deviations, and number of samples collected for VOCs in the waste stream/waste stream lot. Summary Categories S3000 and S4000.
8	N/A	Mean concentrations, UCL ₉₀ for the mean concentrations, standard deviations, number of samples collected for SVOCs in the waste stream/waste stream lot. Summary Categories S3000 and S4000.
9	N/A	Mean concentrations, UCL ₉₀ for the mean concentrations, standard deviations, and number of samples collected for metals in the waste stream/waste stream lot. Summary Categories \$3000 and \$4000.
10	MA	Sufficient number of samples was taken to meet statistical sampling requirements:
11	***	Only validated data were used in the above calculations, as documented through the site data review and validation forms and process.
1/2/	- X	Waste containers were selected randomly for sampling, as documented in site procedures.
13	- X.	The potential flammability of TRU waste headspace gases.
14	7 0	Sufficient number of waste containers was visually examined to determine with a reasonable level of certainty that the UCL _® for the miscertification rate is less than 14 percent.
15	. %	Whether the waste stream exhibits a toxicity characteristic (TC) under 40 CFR Part 261, Subpart C:
16	1	All TICs were appropriately identified and reported in accordance with the requirements of the WAP prior to submittal of a waste stream profile form for a waste stream or waste stream lot.
17	. 🗸	The overall completeness, comparability, and representativeness QAOs were met for each of the analytical and testing procedures as specified in the WAP Sections B3-2 through B3-9 prior to submittal of a waste stream profile form for a waste stream or waste stream lot.
18		The RTLs (i.e., PRQLs) for all analyses were met prior to submittal of a waste stream profile form for a waste stream or waste stream lot.
19	V	Whether the waste stream can be classified as hazardous or non-hazardous at the 90-percent confidence limit.

Check (*) indicates that data or acceptable knowledge are sufficient to determine the waste parameters and that the waste parameters have been reported in the listed document or database. N/A indicates parameter does not apply to waste stream. NO indicates data are insufficient.
 All containers used to profile this waste stream were visually examined.

Signature of Site Project Manager Printed Name

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Data Summary Report—Table 2: Headspace Gas Summary Data

WSPF # RF002.01

2A

ANALYTE	# Samples ^c	Maximum (ppmy)	Mean (ppmv)	SD (ppmv)	UCL ₉₀ (ppmv)	RTL ^d (ppmv)	EPA Code
1,1-Dichloroethane						NA	
1,2-Dichloroethane	·					10	-
1,1-Dichloroethylene						10	
cis-1,2-Dichloroethylene			Variation and a second a second and a second a second and			NA	
1,1,2,2-Tetrachloroethane						10	
1,1,1-Trichloroethane					<u> </u>	10	
1,1,2-Trichloro-1,2,2- Trifluoroethane						10	
Acetone	12	10.6	2.85	2.94	3.61	100	·
Benzene	1	1.3	0.19	0.22	0.25	10	.,
Bromoform						NA	
Butanol		MAY16				100	
Carbon disulfide						10	
Carbon tetrachloride						10	
Chlorobenzene			**************************************			10	, , , , , , , , , , , , , , , , , , ,
Chloroform			-,			10	
Ethyl benzene	2	1.0	0.19	0.18	0.24	10	
Ethyl ether						100	
Methanol	2	25.8	5.6	4,5	6.77	100	
Methyl ethyl ketone	6	6.3	1.58	1.52	1.97	100	
Methyl isobutyl ketone			<u></u>			100	
Methylene chloride	1	0.7	0.17	0.11	0.19	10	
o-Xylene .	2	0.9	0.19	0.18	0.24	10	
m/p-Xylene	2	3.6	0.35	0.74	0.54	10	Commenter of the commen
Tetrachloroethylene		, , , , , , , , , , , , , , , , , , ,			And the Complete of the Comple	10	
Toluene	20	30.7	5.8	7.6	7.80	72.02°	
Trichloroethylene						10	, , , , , , , , , , , , , , , , , , ,



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Data Summary Report—Table 2: Headspace Gas Summary Data (continued)

WSPF # RF002.01

2B

TENTATIVELY IDENTIFIED COMPOUND	Maximum Observed Estimated Concentrations (ppmv)	# Samples Containing TIC ^c	
No TICs included in the 40 CFR 261 Appendix VIII list were detected in at least 25 percent of headspace gas samples for the waste stream lot.			
A			

Did the	data	verify th	e acce	ntable	knowledge?	Ø Yes	□ No
טוע נווס	uau	ACINA CI	- a	PIGDIC	MINIOUS	<u> </u>	

If not, describe the basis for assigning the EPA Hazardous Waste Codes:

NOTES:

- ^a No entry indicates no associated EPA Code assigned to the waste stream.
- ^b No entry indicates no additional target analytes.
- No entry indicates no detectable measurements available for statistics. The number entered in this column identifies the number of samples with a detectable result for the associated analyte. In these cases, statistics were performed using all the as-reported detectable results and one-half the reported method detection limit (MDL) for the remaining results identified as not detected. A total of twenty-six (26) field samples were collected and analyzed for this profile form.
- d RTLs for headspace gas analysis results correspond to the analyte PRQL for analytes that are hazardous waste constitutents. "NA" means the analyte is not a hazardous waste constituent and so has no associated regulatory threshold.
- ^e Limit used for evaluating EPA Hazardous Waste Code for toluene (Reference No. 3).



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Data Summary Report—Table 6: Exclusion of Prohibited Items

WSPF # RF002.01

The absence of prohibited items is documented through acceptable knowledge. The absence of free liquids, indicating no corrosive, ignitable or reactive waste, and the absence of pressurized containers has been verified by radiography or visual examination of each container in this waste stream or waste stream lot



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Data Summary Report—Table 7: Correlation of Container Identification to Data Packages

WSPF # RF002.01

Drum No.	Headspace Sample Batch No.	Headspace VOC Data Package	VE Data Package	Radioassay Data Package	RTR Data Package
D19003	00C0462	HVOC-DP-00236	VE-2000-005	CIQ-98-012	6T1598
D57847	00C1045	HVOC-DP-00237	VE-2000-006	CIQ-98-015	6T1598
D64483	00C1046	HVOC-DP-00238	VE-2000-006	CIQ-98-010	6T1601
D64975	00C0462	HVOC-DP-00236	VE-2000-006	CPN-98-003	6T1598
D65226	00C1045	HVOC-DP-00237	VE-2000-004	CIQ-98-009	6T1598
D65678	00C0462	HVOC-DP-00236	VE-2000-006	CIQ-98-026	6T1598
D66214	00C1046	HVOC-DP-00238	VE-2000-005	CIQ-98-005	6T1601
D68384	00C0462	HVOC-DP-00236	VE-2000-005	CIQ-98-013	6T1598
D68691	00C0462	HVOC-DP-00236	VE-2000-005	CIQ-98-009	6T1598
D69007	00C1047	HVOC-DP-00239	VE-2000-006	CIQ-98-027	6T1601
D69086	00C0462	HVOC-DP-00236	VE-2000-005	CIQ-98-009	6T1598
D70380	00C1045	HVOC-DP-00237	VE-2000-006	CIQ-98-018	6T1598
D72026	00C1045	HVOC-DP-00237	VE-2000-006	CIQ-98-009	6T1598
D73365	00C1046	HVOC-DP-00238	VE-2000-006	CIQ-98-007	6T1601
D74729	00C1045	HVOC-DP-00237	VE-2000-005	CIQ-98-026	6T1598
D74778	00C1046	HVOC-DP-00238	VE-2000-005	CIQ-98-006	6T1601
D75604	00C1046	HVOC-DP-00238	VE-2000-005	CIQ-98-011	6T1601
D76814	00C1046	HVOC-DP-00238	VE-2000-005	CIQ-98-010	6T1601
D76909	00C1045	HVOC-DP-00237	VE-2000-006	CIQ-98-012	6T1598
D80680	00C1047	HVOC-DP-00239	VE-2000-006	CIQ-98-007	6T1601
D82192	00C1046	HVOC-DP-00238	VE-2000-006	CIQ-98-013	6T1601
D83403	00C1047	HVOC-DP-00239	VE-2000-006	CIQ-98-007	6T1601
D86071	00C1046	HVOC-DP-00238	VE-2000-006	CPN-98-006	6T1601
D86943	00C1046	HVOC-DP-00238	VE-2000-006	CIQ-98-008	6T1601
D92587	00C0461	HVOC-DP-00235	VE-2000-005	CIQ-99-017	5T0103
D92927	00C0461	HVOC-DP-00235	VE-2000-003	CPN-99-007	5T0103

RMRS-WIPP-98-100 Date Effective: 1 20 00

Revision 7
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5.3 TRU Metal Debris Waste

Profile No. RF002.01

Acceptable Knowledge Waste Stream Summary

Waste Stream: Metal Wastes, RF-197, RF-320b, RF-480i, RF-824

Generation Buildings: Buildings 371, 374, 559, 707, 771, 776, 777, 779, 881, 886, and 991^(6,7)

Waste Stream Volume (Current): 922 55-Gallon Drums and 194 Standard Waste Boxes (6,7)

Generation Dates (Current): December 1981 — October 1999 (6,7)

Waste Stream Volume (Projected): 4,465 m³ (55-gallon drums and Standard Waste Boxes) (7,8,9)

Generation Dates (Projected): November 1 — September 2005 (8,9)

TRUCON Content Codes (1): RF 117A, RF 117B, RF 117C, RF 117D, RF 117E, RF 117F

RF117N

Transuranic Waste Baseline Inventory Report Information (2)

WIPP Identification Numbers: RF-TT0320, RF-TT0479, RF-TT0480, RF-TT0481, RF-TR0320, RF-TR0479, RF-TR0480

Summary Category Group: S5000 Waste Matrix Code Group: Uncategorized Metal

Waste Matrix Code: S5111 and S5119 (IDC 320 only)

Waste Stream Name: Metal/TRU and Heavy Metal (non-SS)/TRU

Description from the TWBIR: <u>Includes items such as gloveboxes</u>, <u>machinery</u>, and <u>empty containers</u>. <u>IDC 320 consists of tantalum</u>, <u>tungsten</u>, and <u>platinum scrap such as crucibles</u>, funnels, rods, and fixtures.

Waste Stream Description

TRU metals consists of tantalum targets and subtargets (IDC 197), heavy non-special source (SS) metal (IDC 320), empty reusable cans (IDC 479), light metal (IDC 480), and light non-SS metal (unclassified) (IDC 481). The following table presents the waste matrix codes and waste material parameters for metal wastes.⁽³⁾



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IDC	IDC Description	Waste Matrix Code	Waste Material Parameters	Weight % (Average)
197	Ta Target and Subtarget, To Be Leached	S5111. Metal Debris w/o Pb or Cd	Other Metal/s/Alloys	100%
320	Heavy non-SS Metal	S5111. Metal Debris w/o Pb or Cd	Other Metal/s/Alloys	100%
479	Empty Cans	S5111. Metal Debris w/o Pb or Cd	Iron-based Metal/Alloys	100%
		S5111, Metal Debris w/o Pb or Cd	Iron-based Metal/Alloys Cellulosics (fiberboard liner)! Plastics (liners)! Aluminum-based Metal/Alloys	
481	Light non-SS Metal (unclassified)	S5111, Metal Debris w/o Pb or Cd	Iron-based Metal/Alloys Cellulosics (fiberboard liner) Plastics (liners) Aluminum-based Metal/Alloys	93% 3% 3% 1%

Notes:

- 1. The average weight percent of cellulosic materials is based on RTR and includes the fiberboard liner.
- 2. The average weight percent of plastic materials is based on RTR and includes plastic liner bags.

IDC 197, Ta Target and Subtarget: Tantalum targets and subtargets are tantalum substrates used for coating processes. The materials are size-reduced prior to being repackaged. (10)

IDC 320, Heavy non-SS Metal: Non-stainless steel metals that are heavier than iron. Examples of this waste include crucibles, funnels, rods, and process fixtures made primarily from tantalum tungsten, and platinum. Since 1987, lead has been segregated from this waste as IDC 321. (4.5)

IDC 479, Empty Reusable Cans: Stainless-steel cans used to manually transfer plutonium-contaminated materials between gloveboxes. Cans were typically recycled and reused. [5] IDC may be changed to 480 when material declared as waste.

IDC 480, Light Metal: Iron, copper, aluminum, stainless steel, galvanized metal, carbon steel brass, bronze, and other common alloys. Metal waste items may include mechanical and electrical parts, tools, containers, scrap metals, piping wire, cable, guages, valves, foil, and planchets. (5) (5)

IDC 481, Leached Light Metal: This waste consists of light metal, primarily stainless-steel and aluminum equipment, that was rinsed to remove radioactive surface contamination. This IDC is no longer active and has been replaced by IDC 480.⁽⁵⁾

IDC 824, Light Metal TRU Waste: This IDC is assigned to light metal identified as being TRU waste. The metal types and waste items are the same as IDC 480.⁽⁵⁾



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Areas of Operation

TRU metal wastes have been generated by the following operations:

- Plutonium Production
- Plutonium Recovery and Purification
- Laboratory Operations
- Waste Treatment
- Research and Development
- Maintenance
- Residue Repackaging and Treatment
- Decontamination and Decommissioning Operations

Generation Processes

Metal wastes have been generated by nearly every operation on site. The following table provides the title of each generating process along with the corresponding WSRIC building and process number. A description of each of these processes, process flow diagrams, and details of each metal waste stream can be found in the WSRIC Building Books or archived WSRIC files.

Building	Process	Title	
		Building 371	
371	. 1	DCHP Preparation	
371	3	Repack Operations	
371	4	Analytical Lab	•
371	5	Chemical Standards Laboratory	
371	6	PROVE Vacuum System	•
371	· 7	Process Vent Scrubber	•
- 371	15	General Waste (RMMA)	
371	18	Heating, Ventilation, & Air Conditioning	
371	19	Caustic Waste Treatment System	
371	21	Nitrate Contaminated Residue Treatment	
371	22	Beryllium Parts Cleaning	·
371	23	Salt Residues Repack Project	
· · · · · · · · · · · · · · · · · · ·		Building 374	
374	l	Acid Neutralization	
		Building 559	
559	2	Dynamic Analysis	
559	3	X-Ray Methods	
559	4	Infrared Analysis	
559	5	GC/MS Environmental Samples/RCRA Waste	
559	6	Thermal Analysis	
559	8	Miscellaneous Analyses	
559	9	Isotopic Analysis	
559	11	Nondestructive Analysis	



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Building	Process	Title
		Uranium Analysis
		Gallium Analysis
	*	Plutonium Assay
		Carbon Analysis
		Raschig Ring Analysis
		Assay Of Uranium By Auto Titration
		Sample Receiving
		Sample Break In And Sample Cutting
	•	Maintenance
		ICP Spectroscopy
		Atomic Absorption
		General Waste
		Extractions
		GC AnalysisProduction Support
		GC AnalysisProduction Support
		Total Metals Digestion
		Toxicity Characterization Leaching Procedure
		Analysis Of Sulfides/Aqueous Solutions
		Total And Amenable Cyanide Analysis
		Analysis For Reactive Sulfides
		Analysis For Reactive Cyanide
		Sulfide Analysis
		Cyanide Analysis
		Mercury Analysis
		Reactivity Characteristic Test of Pyrochemical Salts
		Chromium (VI) Determination
		Ion Chromatography Radiochemical Operations
		Particle Size Distribution
561		Building 561 Filter Plenum Building
		Building 707
707		Module A
707	2	Module K/X-Y Retriever
707 .	3	Module J
707	4	Rolling/Forming, Module B
70 7	6	MachiningModule A
707	7	MachiningModule C
70 7	9	MachiningModule G
70 7	10	Electron Bombardment Brazing
707	11	Density Balance—Module B
70 7	12	Density Balance—Module C
707	16	Assembly—Superdry
707	17	Assembly - Welding and Cleaning
70 7	20	Inspection
70 7	21	TestingModule H
707	23	Briquetting
707	26	Calibration LabModule D

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	9だら	20

Building	Process		Title Title
		Maintenance	
		Duct Remediation	
		General Waste	
		Module B Through H	
•		Deactivation/Decon/Decommissioning (D\	3)
		Idle Equipment	
		HEPA filter Media Testing	
		Salt Stabilization	•
		Residue Vitrification Study	
		Dry Residue Repack	
		Ash Residue Stabilization/Repack	
		Building 771	
771	1	High-Level Dissolution	
771	2	Low-Level Dissolution	
771	. 3	Cation Exchange	
771	4	Anion Exchange	
771	5	Feed Evaporation	·
771	6	Precipitation Feed Batching	
771	7	Precipitation	•
771	8	Precipitation Filtrate Evaporation	
771	9	Calcination	
771	10.	Hydrofluorination	
. 771	11	Reduction And Button Breakout	•
771	12	Miscellaneous Residue Processing	
771	13	Metal Burning	
771	14	Crushing And Grinding	
<i>3</i> 71	15	Spray Leach	
771	16	Oralloy Leach	•
771	17	Oralloy (OY) Precipitation	•
771	18	Special Recovery Anion Exchange	
771	19	Caustic Filtration	
771	20	Fume Scrubber	
771	21	Vacuum Systems	•
771	23	Radioactive Inorganic Laboratory	
771	24	Chemical Standards Laboratory	
771	25	Chemical Technology	
771	26	Plutonium Metallurgy	•
771	27	Plenums	•
771	29	Maintenance	
771	· ' 31	Raschig Ring Removal	•
771	3 2	Radiological Safety	
771	35 ·	General Building Waste (RMMA)	•
771	36	H-4 Support Vacuum Systems	
771	39	Solution Processing	



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LATE		

774	2.5	Basic Liquid Waste: First Stage	
,		Basic Liquid Waste: Second Stage	
		Precipitation/filtration	
		Microwave	
		Building 776/777	
776	· · · · · · · · · · · · · · · · · · ·	Pyrochemical Processing	
776	3	Advanced Size Reduction Facility	
<i>7</i> 76	5	Coating	
776·	6	Utilities	
776	9	MaintenancePipe Shop	
776	10	MaintenanceSheet Metal Shop	
7.76		Machine Shop	
776	13	Supercompactor	
776	14	General Building Waste	•
777	1	Special Weapons Projects	
777	2	Disassembly	
777	4	Briquetting	
777	6	Super Dry	
777	7	Machining	•
777	-8	Density Balance	
777	O	Inspection	
777	ĺ2	•	
777	13	Carbon tetrachloride System Nuclear Assembly Technology	
777	13	Trichloroethane Collection & Filtration	
777	15		
		Calibration Laboratory	-
777	16 18	Coatings Laboratory	
777		Plutonium Metallurgical Lab	
777	20	Joining Pigma Welder	
777	21	Joining CO2 Laser	
777	23	General Building Waste	•
776_777	_	Advanced Size Reduction Facility	
776_777	5	Supercompactor	
776_777	6	General Building Waste	
776_777	7	Nuclear Material Handling And Packaging	
776_777	9	TCA Collection and Filtration	
776_777		Carbon Tetrachloride System	
450		Building 779	
779	2	Generic Residue Treatment Process Wastes	
779	3	RTT-Direct Oxide Reduction	
779	4	RTT-Molten Salt Extraction	
779	8	RTT-Salt Recycle	
779	9	Hydride-Hydride And Metal	
779	10	Hydride-Hydride/Oxide	
779	11	Hydride-Acid Leach	
779	14	Physical Metallurgy	
779	15	Non-Plutonium Physical Metallurgy	
779	16	RTT-Plutonium Oxide Dissolution	
779	17	RTT-Peroxide Precipitation	

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Building	Process	Title
779	. 18	RTT-Residue Recovery Extraction
779	21	RTT-Ion Exchange Resin Project
779	23	Pu Tech-Gas-Solid Kinetic Studies
779	25	Nondestructive Lab Testing & Metal Study
7 79	26	Surface Analysis Laboratory
779	27	Pu Tech-Microbalance Pu Reaction Studies
779	28	Utilities
779	37	D&D Programs
779	40	Deactivation
779	41	Ferrite Actinide TRTMT of TRU Mixed Oil
**************************************		Building 886
886	2	Maintenance
		Building 991
991	1	Building Operations
<u> </u>		. D & D
D&D	3	Low-Level & TRU, Nonhazardous Waste Streams

RCRA Characterization

The following table presents the chemical constituent codes (CCC) and EPA Hazardous Waste Numbers associated with the BWR Subpopulations and WSRIC Waste Streams assigned to TRU metal waste containers. Supporting characterization information is provided in the BWR Baseline Book, active WSRIC Building Books, and WSRIC archived files.

IDC	BWR Subpopulation	WSRIC Waste Stream	RCRA CCC	Non-RCRA CCC	EPA Hazardous Waste Numbers
	Suppopulation	The second secon	and Subtarg		TT WORK O'D A T MEMBERS ME SE
0197		707 - 41 - 1	00	00	None
		Heavy N	ion-SS Metal		
0320		371 - 15 - 134	00	0 0	None
0320		371 - 15 - 135	00	00	None
0320		371 - 23 - 7	00	00	None
0320		707 - 1 - 37	00	00	None
0320		707 - 3 - 5	00	00	None
0320		707 - 39 - 9	00	00	None
0320		776_777 - 6 - 138	00	00	None
0320		779 - 37 - 24	00	00	None
0320		779 - 40 - 87	00	00	None
0320		779 - 40 - 112	00	07	None
0320		D&D - 3 - 14	00	00	None
0320	25A		00	00	None
		Empty R	Reusable Can	S	S. C. T. S. Marketon and C. C. S. C.
0479	and the second	707 - 41 - 15	00	00	None
0479	24A		00	00	None



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IDC	BWR	WSRIC	RCRA	Non-RCRA	EPA Hazardous
***************************************	Subpopulation	Waste Stream	CĆC	CCC	Waste Numbers
			ht Metal	minute equipments	
0480		371 - 3 - 6		00	None
0480		371 - 4 - 19		00	None
0480		371 - 5 - 6		0264	None
0480		371 - 6 - 3		00	None
0480		371 - 15 - 7		00	None
0480		371 - 15 - 33		00	None
0480		371 - 15 - 97		00	None
0480	•	371 - 19 ⁻ - 12		00	None
0480		371 - 19 - 13		00	None
0480		371 - 19 - 15A		68	None
0480		371 - 20 - 18		70	None
0480		371 - 21 - 3		02	None
0480		371 - 21 - 8		. 00	None
0480		371 - 21 - 17		70	None
0480		371 - 22 - 3		07	None
0480		371 - 23 - 23		00	None
0480		374 - 1 - 11		00	None
0480		559 - 3 - 14		00	None
0480		559 - 4 - 27		00	None
0480		559 - 4 - 57		00	None
0480	•	559 - 5 - 20		00	None
0480		559 - 5 - 46		00	None
0480		559 - 6 - 14		00	None
0480		559 - 6 - 23		00	None
0480		559 - 8 - 54		00	None
0480		559 - 9 - 11		02	None
0480		559 - 9 - 31		00	None
0480		559 - 14 - 4		02	None
0480		559 - 16 - 21		00	None
0480		559 - 21 - 12		00	None
0480		559 - 24 - 8		00	None
0480		559 - 25 - 4		00	None
0480		559 - 25 - 19		. 00	None
0480		559 - 28 - 12		00	None
0480		559 - 30 - 38		00 [,]	None
0480	•	559 - 30 - 59		00	None
0480		559 - 31 - 35		00	None.
0480		559 - 33 - 21		00	None
0480		559 - 41 - 39		00.	None
0480		559 - 42 - 36		00	
0480		559 - 43 - 10		00	None
0480		559 - 44 - 3			None
0480		559 - 44 - 5 559 - 45 - 5		00	None
0480		559 - 45 - 5 559 - 48 - 6		00	None
U40U		339 - 48 - D		00	None



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IDC	BWR Subpopulation	WSRIC Waste Stream	RCRA CCC	Non-RCRA CCC	EPA Hazardous Waste Numbers
0480			00	00	None
0480			00	00	None
0480			00	00	None
0480			00	00	None
0480			00	00	None
0480			00	10	None
0480		•	00	00	None
0480		,	00	00	None
0480			00	00	None
0480			00	00	None
0480	·		00	32	None
0480			00	00	None
0480			00	70	None
0480			00	00	None
0480			00	00	None
0480			00	00	None
0480			00	00	None
0480			00	70	None
0480			00	00	None
0480			00	00	None
0480			00	00	None
0480			00	00	None
0480			. 00	00	None
0480	•		00	00	None
0480			00	00	None
0480		•	00	00	None
0480			00	00	None
0480			00	00	None
0480			00	00	None
0480	•		00	00	None
0480			00	32	None
0480			00	00	None
0480			00	00	None
0480			00	00	None
0480			00	00	None
0480			00	00	None
0480			00	70	None
0480			00	70 70	None
			00	00	None
0480				00	None
0480			00		
0480			00	00	None
0480			00	00	None
0480			00	00	None
0480			00	00	None

DWD

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IDC	BWR Subpopulation	WSRIC Waste Stream	RCRA CCC	Non-RCRA CCC	EPA Hazardous Waste Numbers
0480		776 - 13 - 47	00	00	None
0480		776 - 14 - 38	00	00	None
0480		777 - 23 - 8	00	00	None
0480		776_777 - 1 - 3	00	00	None
0480		776_777 - 1 - 7	00	00	None
0480		776_777 - 5 - 6	00	00 ·	None
0480		776_777 - 5 - 7	00	00	None
0480		776_777 - 5 - 24	00	. 00	None
0480		776_777 - 6 - 26	00	00	None
0480		776_777 - 6 - 125	00	07	None
0480		776_777 - 6 - 133	00	0770	None
0480		776_777 - 7 - 1	00	00.	None
0480		776_777 - 9 - 9	00	00	None
0480		776_777 - 11 - 6	00	00	None
0480		779 - 2 - 2	00	00	None
0480		779 - 10 - 10	00	00	None
0480		779 - 14 - 6	00	00	None
0480		· 779 - 28 - 13	00	00	None
0480		779 - 37 - 15	00	00	None
0480		779 - 40 - 17	00	00	None
0480		779 - 40 - 18	00	00	None
0480		779 - 40 - 114	00	07	None
0480		886 - 2 - 14	00	00	None
0480		991 - 1 - 7	00	00	None
0480		D&D - 3 - 10	00	00	None
0480		D&D - 3 - 11	00	00	None
0480		D&D - 3 - 12	00	24	None
0480		D&D - 3 - 48	00	70	None
04 80		D&D - 3 113	00	70	None
0480		D&D - 3 114	00	70	None
0480	24B		00	00	None
0480	24D		00	00	None
		Leach L	ight Metal		
0481	240		00	00	None
orabitation bases		TRULI	ght Metal		
0824	24U		00	00	None

Radionuclides

The determination of radionuclides contained in the waste is based on the IDC and the material balance area (MBA) in which the waste originated. The first table summarizes the radionuclides present based on the assigned IDC and can be used for all TRU metal debris wastes. The second table summarizes the radionuclides present in the waste based on the generation location. The generation location was determined from the prefix of the container identification number. The



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prefix corresponds to an MBA historically used to track the movement of special nuclear material. Since the Site is no longer in production, the second table is only applicable for certain IDCs generated before 1992 which have not been treated and/or repackaged. (3)

IDC	Radionuclides ^{1,2,3}	Rationale
	WG Pu, EU	IDC generated by Building 777 coatings, which coated substrates with plutonium and enriched uranium (and non-radioactive metals).
320	WG Pu, Am-241, DU, EU, Np-237, U-2334	IDC generated in every TRU building; radionuclides dependent on generation process.
479	WG Pu	Transfer cans were used in plutonium recovery areas.
480	WG Pu, Am-241, DU, EU, Np-237, U-2334	IDC generated in nearly every TRU building;
824		radionuclides dependent on generation process.
481	WG Pu, Am-241, DU, EU, Np-237, U-233	IDC generated from washing of metals originating from any process within the PA.

Key:	WG Pu Am-241 DU EU	weapons-grade plutonium americium-241 depleted uranium enriched uranium
	Np-237 U-233	neptunium-237 uranium-233

Notes.

Only waste generated before 1986 may contain Np-237 because processing of this material was discontinued at this time.

- Only waste generated before 1983 may contain U-233 because processing of this material was discontinued at this time.
- 3. Am-241 is indicated only for IDCs (unless notes otherwise) in which americium operations were performed (e.g., molten salt extraction). Am-241 is not indicated if it is expected to be present only due to plutonium-241 decay.
- 4. For backlog wastes (generated before 1992) that have not been treated and/or repackaged, radionuclides can also be determined based on the container prefix listed in the following table.

Sulling VI					
371	0017	Residue Repack, Rm. 3602	Note 1		
371	0032	Aqueous Recovery	WG Pu, Am-241		
371	0034	Aqueous Recovery	WG Pu, Am-241		
371	0039	DCHP Preparation	WG Pu		
371	0043	Stacker Drums	Note 1		
371	0071	Analytical/Standards Laboratory	WG Pu, EU, DU, Am-241		
371	0073	Aqueous Recovery	WG Pu, Am-241		
	V-Contractive Contractive Cont	Repackaging Residues/PBA's	Note 1		
	Aqueous Recovery	WG Pu, Am-241			



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Building	Prefix	Prefix Description	Potential Radionuclides
		Aqueous Recovery	
	*	Building 374	
374	0749	Liquid Waste Operations	WG Pu. EU; DU, Am-241
		Building 559	
559	0029	Analytical Lab, Production Support	WG Pu. EU, DU, Am-241
	on and addition and in a page 1886 that a	Building 707	
707	0012	Metallurgy Operations, Casting	WG Pu, Am-241, EU
707	0015	Metal Fabrication, Part V	WG Pu
707	0022	Metal Fabrication, Machining	WG Pu
707	0031	Metallurgy Fabrication Assembly	WG Pu
		Building 771	
771	0002	Aqueous Recovery	WG Pu, EU, DU, Am-241
771	0005	Building 771 Second Floor Construction	WG Pu
771	0009	Plenums	WG Pu, EU, DU, Am-241
771	0037	Analytical Laboratory	WG Pu, EU, DU, Am-241
771	0038	Chemical Standards Laboratory	WG Pu, EU, DU, Am-241
771	0042	Chemical Technology	WG Pu, EU, DU, Am-241
771	0074	EU Leach	EU, WG Pu
771	0078	Plutonium Metallurgy Development	WG Pu, EU, DU, Am-241
		Building 776	
776	0003	Pyrochemical Operations	WG Pu, Am-241, EU
776	0019	Size Reduction	Note 1
776	0025	Drum Repack	Note 1
776	0057	Advanced Size Reduction	Note 1
776	0075	Waste Process Development	WG Pu
776	0776	Generation Prefix for Bldg. 776	Note 2
776	9069	Prefix 9069	Note 2
	<u> </u>	Building 777	***************************************
777	0016	Production Control Coatings Development	WG Pu, EU
777	0021	Metallography Laboratory	WG Pu, EU, DU, Am-241
77 7	0023	Metal Fabrication Machining Development	WG Pu, EU, Am-2414
777	0024	Metallurgy Fabrication Disassembly	WG Pu, EU
777	0066	Special Assembly Projects	WG Pu, EU, DU, Am-241
and a second control of the Anthon Control o		Building 779	Market Market (1922) (1920) (1920) (1920) (1920) (1920) (1920) (1920) (1920) (1920) (1920) (1920) (1920) (1920)
779	0052	Pyrochemistry Technology Process Development	WG Pu, Am-241, EU
779	0054	R & D Residue Drums	WG Pu, EU, DU, Am-241
779	0055	Hydride Operation. Rooms 152A/160A	WG Pu
779	0077	Product Physical Chemistry VTR	WG Pu, EU, DU
Maria Caracana da		Building 881	The state of the s
881	881A	Generation Prefix for Bldg, 881	Note 2
881	881C	Generation Prefix for Bldg. 881	Note 2
~ ~ .		Building 886	
886	0081	Nuclear Safety	WG Pu, EU
777	2227	Not Defined	The state of the s

weapons-grade plutonium

EU DU enriched uranium depleted uranium

Am-241

americium-241

Notes:

Wastes assigned these prefixes originated from other areas or were generated during repackaging of wastes from other areas. The repackaged containers were assigned the prefix for the area where the wastes were repackaged. The source of these wastes is difficult to determine and may include any radionuclides processed on plant site.

These prefixes have not been assessed for potential radionuclides. Radionuclide contaminants will be determined at assay.

Am-241 (above ingrowth) and U-235 were detected by radioassay in backlog wastes from Building 707, prefix 12. These radionuclides were not anticipated based on acceptable knowledge, but are being added for waste generated before 1992 from prefix 12 because of these results.

4. Am-241 (above ingrowth) was detected by radioassay in backlog wastes from Building 777, prefix 23. This radionuclide was not anticipated based on acceptable knowledge, but is being added for wastes generated before 1992 from prefix 23 because of these results.

References

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- 2 DOE 1995. Transuranic Waste Baseline Inventory Report, Revision 2. DOE/CAO-95-1121
- 3 RMRS 1999. RFETS TRU Waste Acceptable Knowledge Supplemental Information. RF/RMRS-97-018, Revision 6.
- 4. RFETS 1999. Backlog Waste Reassessment Baseline Book, Waste Form 25, Heavy Metal.
- 5. RFETS 1999. Backlog Waste Reassessment Baseline Book, Waste Form 24, Metal.
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